

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

HLPLY TO THE ATTENTION OF

AR-18J

Ms. Janet McCabe Assistant Commissioner Office of Air Management Indiana Department of Environmental Management 100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015

Dear Ms. McCabe:

This letter is in response to your letter dated December 11, 2000, regarding the Charlestown ozone data. Your staff requested Region 5 to review the 1998 Charlestown ozone data and the supporting documentation to determine whether a "Clean Data Finding" could be made for this site. Currently, the estimated ozone exceedences are approximately 3.2 for 1998 due to missing data.

From the documentation your staff provided, Region 5 understands that the Charlestown site did not have electricity from April 1 to April 7, 1998, due to an anticipated move of the site within the Indiana Army Ammunition Plant. While we understand the situation was inadvertently created at the beginning of the Indiana ozone season, Region 5 does not wish to set a precedent of excluding estimated exceedences due to the late start-up of an ozone site.

We do, however, concur with your staff's analysis that it is unlikely that an ozone exceedence occurred at this site either April 3, 1998 or April 4, 1998. The supporting documentation clearly shows that the six surrounding monitors recorded low ozone levels on April 3-4, 1998, and historically the Charlestown monitor tracks with these monitors. The meteorological documentation your staff provided shows weather conditions not conducive to ozone formation at this site for April 3-4, 1998: temperatures between 42-58 degrees, overcast skies, showers, and windy conditions.

2

In addition, 40 CFR Part 50 Appendix H states: "A missing daily maximum ozone value may be assumed to be less than the level of the standard if the valid daily maxima on both the preceding and the following day do not exceed 75 percent of the level of the standard." This would apply to the missing data from August 1, 1998. Based on this, we think it is reasonable to assume that the ozone concentrations for the Charlestown monitor were less than the one hour standard on April 3, 1998, April 4, 1998 and August 1, 1998, and it should be noted as such in the Aerometric Information Retrieval System.

My staff will visit Indiana to verify the Charlestown monitoring data in the near future. If you have any questions regarding this letter, please contact Patricia Schraufnagel at 312-886-5955 or Michael Rizzo at 312-353-6324.

Sincerely yours,

Jay Bortzer, Acting Chief

Air Programs Branch